

**Deposition of Jim Jack-- by Eugene Miller**

1 Q (EM) When and what caused you to believe I was stalking?

2 A (Jack) I NEVER, EVER BELIEVED YOU WERE STALKING you've asked that.-- I've  
3 answered that multiple times.

4 Q (EM) Well, let me ask you then, Jim, why did you come out to my house?

5 A (Jack) To get a description of your vehicle-- so my niece would know-- what you  
6 drove-- because she was afraid of you.

7 Q (EM) SHE SAID SHE WAS NOT AFRAID OF ME ON THE WITNESS STAND.  
8 NOW WHO'S LYING?

9 A (Jack) I DON'T KNOW (softly said).

10 Q (EM) YOU DON'T KNOW?

11 A (Jack) I DON'T KNOW

12 Q (EM) SOMEBODY HAS TO BE

13 (Boyd) Are you going to ask questions are are you going to be accusatory? If you're  
14 going to ask questions that's appropriate.

15 Q (EM) Well, Jim-- when you took down my license number and the description of my  
16 car-- draw me a little picture of my house and which way my car was facing [paper handed  
17 to him]

18 A (Jack) I'm not a artist. I don't remember.

19 Q (EM) Well-- Here-- Here is a block diagram. This is my house. Here's my driveway.

20 Tell me which way my car was facing.

21 A (Jack) I don't remember--

22 Q (EM) But you can remember everything else-- is that not right? But you can't

1 remember which way my car was facing?

2 (Boyd) Object. It's argumentative.

3 A (Jack) First place, I didn't write it down. Joe Carbacio did.

4 Q (EM) Ok, when did he write it down?

5 A (Jack) I was driving.

6 Q (EM) WHEN DID HE WRITE IT DOWN?

7 A (Jack) AS WE DROVE BY YOUR PLACE.

8 Q (EM) WHICH DIRECTION?

9 A (Jack) GOING UP TOWARD WHERE DEPUTY SCOTT LATTEA LIVES WE

10 WERE GOING THAT DIRECTION.

11 Q (EM) Ok. So where would have my car had been setting?

12 A (Jack) I don't know.